



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590



REPLY TO THE ATTENTION OF:

Bob Bernoteit
Bureau of Air
Illinois Environmental Protection Agency
1021 North Grand Avenue East
Springfield, Illinois 62794-9276

Dear Mr. Bernoteit:

On June 18, 2013, the U.S. Environmental Protection Agency shared with you an electronic copy of its comments on the draft Construction Permit No. 12100052 (draft permit) prepared by the Illinois Environmental Protection Agency for Saint-Gobain Containers, Inc. (SGCI). By this letter, EPA is amending Comment No. 1 as contained in the June 18, 2013 comment letter. EPA amends Comment No. 1 to read as follows:

1. EPA notes that SGCI did not adjust its baseline actual emissions "downward to exclude any emissions that would have exceeded an emission limitation with which the major stationary source must currently comply, had such major stationary source been required to comply with such limitations during the consecutive 24-month period" as required by 40 C.F.R. § 52.21(b)(48)(ii)(c). Section 52.21(b)(48)(ii)(c) does require sources to adjust their baseline actual emissions downward to exclude emission reductions that have or will result from compliance with a Consent Decree (CD) requirement. However, Paragraph 29 of SGCI's CD states that the CD is not "intended to prohibit SGCI from seeking to utilize emission reductions from the Installation of Controls required by this Consent Decree in determining whether a project on the same Furnace that includes both the Installation of Controls under this Consent Decree and other simultaneous construction that is permitted at the same time...triggers New Source Review." Although CD requirements are applicable emission limitations that the source should apply to the baseline, the SGCI CD specifies that for this project, which includes the installation of controls on each of the furnaces in question, the CD does not in and of itself as an applicable emission limitation require SGCI to adjust the baseline actual emissions of these furnaces downward to reflect post-control emission rates for purposes of evaluating whether a significant emissions increase will occur on a particular furnace. In other words, the Paragraph 29 language neither provides for any affirmative allowance on use of emission reductions nor overrides any rule in the Illinois State Implementation Plan (including § 52.21(b)(48)(ii)(c)), it merely specifies the limit of the scope of the CD as an emission limitation requiring a downward

baseline actual emissions adjustment for purposes of evaluating whether there has been a significant emissions increase on a particular furnace. However, per the language of Paragraph 29, SGCI would be required to adjust the furnace baseline actual emissions downward for purposes of evaluating whether any future projects that do not involve the installation of CD controls on those furnaces will trigger New Source Review.

If you have any questions, please contact David Ogulei, of my staff, at (312) 353-0987.

Sincerely,

A handwritten signature in dark ink, appearing to read "John Mooney", with a large, stylized loop at the end.

John Mooney
Chief
Air Programs Branch